

ORIGINAL

VIRGINIA:

IN THE CIRCUIT COURT OF THE CITY OF CHARLOTTESVILLE

NICOLE P. ERA MO)
Plaintiff,)
v.) Case No. CL15-205
ROLLING STONE LLC,)
SABRINA RUBIN ERDELY, and)
WENNER MEDIA LLC,)
Defendants.)

NOTICE OF REMOVAL OF ACTION TO FEDERAL COURT

PLEASE TAKE NOTICE that under 28 U.S.C. §§ 1441, 1446, and 1332, a Notice of Removal of Action was filed on May 29, 2015 with the Clerk of the United States District Court for the Western District of Virginia, Charlottesville Division. A Notice to Opposing Parties of Removal of Action to Federal Court is being filed today. Copies of these notices are attached hereto. (See Attachments 1-2.)

Under 28 U.S.C. § 1446(d), upon the filing of this Notice, "the State court shall proceed no further unless and until the case is remanded."

Dated: May 29, 2015.

Respectfully Submitted,



Micah J. Ratner
Virginia Bar Number: 78961
DAVIS WRIGHT TREMAINE LLP
1919 Pennsylvania Avenue, N.W.
Suite 800
Washington, DC 20006-3401
Telephone: (202) 973-4200
Fax: (202) 973-4499

05/29/2015 1328
(Date & Time)
City of Charlottesville
Circuit Court Clerk's Office
Liezelle A. Dugger, Clerk
By 202221
Deputy Clerk

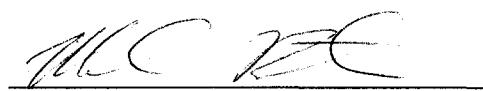
E-mail: micahratner@dwt.com

*Attorneys for Defendants Rolling Stone LLC,
Sabrina Rubin Erdely, and Wenner Media LLC*

CERTIFICATE OF SERVICE

I, Micah J. Ratner, hereby certify that on May 29, 2015, I served the foregoing Notice of Removal of Action to Federal Court and Attachments by U.S. Mail, postage prepaid, to the following:

Thomas A. Clare
Elizabeth M. Locke
Joseph P. Oliveri
Attorneys for Plaintiff
CLARE LOCKE LLP
902 Prince St.
Alexandria, VA 22314



Micah J. Ratner
Virginia Bar Number: 78961
DAVIS WRIGHT TREMAINE LLP
1919 Pennsylvania Avenue, N.W.
Suite 800
Washington, DC 20006-3401
Telephone: (202) 973-4200
Fax: (202) 973-4499
E-mail: micahratner@dwt.com

*Attorneys for Defendants Rolling Stone LLC,
Sabrina Rubin Erdely, and Wenner Media LLC*